REMARKS

This amendment is in response to the Final Rejection of the pending claims in the Office Action of March 7, 2006.

Claims 1, 2, 4, 6 through 15, and 21 through 25 are currently pending in the application.

Claims 1, 15, and 21 have been amended herein.

Claim 5 was canceled herein. Claims 3 and 16 through 20 were previously canceled herein.

Specification paragraphs [0073] to [0079] have been amended for editorial and grammatical purposes. Support for the amendments may be found throughout the specification and particularly in paragraphs [0073] to [0079]. No new matter has been entered to the disclosure as the amendment clearly complies with 35 U.S.C. § 132. The amendments are to clearly distinguish over the cited art. The amendments and cancellation are made without prejudice or disclaimer.

Applicant respectfully requests reconsideration of the rejections.

35 U.S.C. § 103(a) Obviousness Rejections

Obviousness Rejection Based on Wood *et al.* (U.S. Patent 6,453,127) in View of Roosen *et al.* (U.S. Patent Publication 2002/0036793), and Further in View of Levine *et al.* (U.S. Patent 5,726,883)

Claims 1, 2, 4 through 15, 21, 22, 24, and 25 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Wood *et al.* (U.S. Patent 6,453,127) (hereinafter "Wood") in view of Roosen *et al.* (U.S. Patent Publication 2002/0036793) (hereinafter "Roosen"), and further in view of Levine *et al.* (U.S. Patent 5,726,883) (hereinafter "Levine"). Applicant respectfully traverses this rejection, as hereinafter set forth.

Applicant asserts that to establish a *prima facie* case of obviousness under 35 U.S.C. § 103 three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Third, the cited prior art reference must teach or suggest all of the claim limitations. Furthermore, the suggestion to make the claimed

combination and the reasonable expectation of success must both be found in the prior art, and not based on Applicants' disclosure.

Regarding presently amended independent claim 1, Applicant asserts that Wood, Roosen, and Levine, even if combined, do not teach or suggest all of the claim limitations of presently amended independent claim 1 to establish a *prima facie* case of obviousness regarding the claimed invention under 35 U.S.C. § 103. Applicant asserts that Wood, Roosen, and Levine do not teach or suggest the claim limitations of the claimed invention calling for "storing said configured printer control panel in a memory of said workstation."

Applicant asserts that Levine teaches that "[v]arious memory slots [in a multi-function device] are available to store and save the panel upon completion by the operator." *Col. 7, lines 50-51; Col. 1, lines 35-53.* Applicant asserts that Levine teaches that some features of a control panel may be "residing in memory on the network." *Col. 10, lines 50-57.* Applicant asserts that Levine does not teach saving a configured printer control panel in the memory of the workstation.

Applicant asserts that there is no motivation or suggestion to modify Wood with Roosen and with Levine to teach "storing said configured printer control panel in a memory of said workstation." Wood teaches away from storing software in the memory of a workstation. "It is an object of the invention (1) to provide a user interface to all users on the Internet and/or intranet without loading software packages on every computer system." *Col. 1, lines 47-49.*

Additionally, Applicant asserts Wood, Roosen, and Levine do not teach how a printer control panel may be both configurable and stored in the memory of a workstation. Therefore, none of the cited references would provide an enabling disclosure.

Furthermore, any rejection of presently amended independent claim 1 based on the combination of the cited art would be a hindsight reconstruction based on picking and choosing features from the cited references based solely upon Applicant's disclosure without having all the claim elements present.

Therefore, for at least these reasons, a *prima facie* case of obviousness under 35 U.S.C. § 103 has not been established because any combination of the cited art cannot and does not teach or suggest all the claim limitations of the claimed invention. Accordingly, presently amended independent claim 1 is allowable.

Claims 2, 4, and 6 through 14 are allowable for at least the reason of depending from

allowable presently amended independent claim 1. Claim 5 has been canceled herein.

Regarding presently amended independent claim 15, Applicant asserts that Wood, Roosen, and Levine, even if combined, do not teach or suggest all of the claim limitations of presently amended independent claim 15 to establish a *prima facie* case of obviousness regarding the claimed invention under 35 U.S.C. § 103. Applicant asserts that Wood, Roosen, and Levine do not teach or suggest the claim limitations of the claimed invention calling for "where said printer control panel is saved in a memory of said at least one workstation."

Applicant asserts that Levine teaches that "[v]arious memory slots [in a multi-function device] are available to store and save the panel upon completion by the operator." *Col. 7, lines 50-51; Col. 1, lines 35-53.* Applicant asserts that Levine teaches that some features of a control panel may be "residing in memory on the network." *Col. 10, lines 50-57.* Applicant asserts that Levine does not teach saving a configured printer control panel in the memory of at least one workstation.

Applicant asserts that there is no motivation or suggestion to modify Wood with Roosen and with Levine to teach "where said printer control panel is saved in a memory of said at least one workstation." Wood teaches away from storing software in the memory of a workstation. "It is an object of the invention (1) to provide a user interface to all users on the Internet and/or intranet without loading software packages on every computer system." *Col. 1, lines 47-49.*

Additionally, Applicant asserts Wood, Roosen, and Levine do not teach how a printer control panel may be both configurable and stored in the memory of at least one workstation. Therefore, none of the cited references would provide an enabling disclosure.

Furthermore, any rejection of presently amended independent claim 15 based on the combination of the cited art would be a hindsight reconstruction based on picking and choosing features from the cited references based solely upon Applicant's disclosure without having all the claim elements present.

Therefore, for at least these reasons, a *prima facie* case of obviousness under 35 U.S.C. § 103 has not been established because any combination of the cited art cannot and does not teach or suggest all the claim limitations of the claimed invention. Accordingly, presently amended independent claim 15 is allowable.

Regarding presently amended independent claim 21, Applicant asserts that Wood,

Roosen, and Levine, even if combined, do not teach or suggest all of the claim limitations of presently amended independent claim 21 to establish a *prima facie* case of obviousness regarding the claimed invention under 35 U.S.C. § 103. Applicant asserts that Wood, Roosen, and Levine do not teach or suggest the claim limitations of the claimed invention calling for "storing said configured printer control panel in a memory of said workstation."

Applicant asserts that Levine teaches that "[v]arious memory slots [in a multi-function device] are available to store and save the panel upon completion by the operator." *Col. 7, lines 50-51; Col. 1, lines 35-53.* Applicant asserts that Levine teaches that some features of a control panel may be "residing in memory on the network." *Col. 10, lines 50-57.* Applicant asserts that Levine does not teach saving a configured printer control panel in the memory of the workstation.

Applicant asserts that there is no motivation or suggestion to modify Wood with Roosen and with Levine to teach "storing said configured printer control panel in a memory of said workstation." Wood teaches away from storing software in the memory of a workstation. "It is an object of the invention (1) to provide a user interface to all users on the Internet and/or intranet without loading software packages on every computer system." *Col. 1, lines 47-49.*

Additionally, Applicant asserts Wood, Roosen, and Levine do not teach how a printer control panel may be both configurable and stored in the memory of the workstation. Therefore, none of the cited references would provide an enabling disclosure.

Furthermore, any rejection of presently amended independent claim 21 based on the combination of the cited art would be a hindsight reconstruction based on picking and choosing features from the cited references based solely upon Applicant's disclosure without having all the claim elements present.

Therefore, for at least these reasons, a *prima facie* case of obviousness under 35 U.S.C. § 103 has not been established because any combination of the cited art cannot and does not teach or suggest all the claim limitations of the claimed invention. Accordingly, presently amended independent claim 21 is allowable.

Obviousness Rejection Based on Wood in View of Roosen, and Levine, and Further in View of Jackson (U.S. Patent Publication 2002/0131072)

Claim 23 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Wood in view of Roosen, and Levine, as applied to claims 21 above, and further in view of Jackson (U.S. Patent Publication (2002/013072). Applicant respectfully traverses this rejection, as hereinafter set forth.

Regarding claim 23, Applicant asserts that Wood, Roosen, Levine, and Jackson assuming combinability *arguendo*, do not teach or suggest all of the claim limitations of presently amended independent claim 21 to establish a *prima facie* case of obviousness regarding the invention of claim 21 under 35 U.S.C. § 103. Therefore, presently amended independent claim 21 is allowable. Claim 23 is allowable for at least the reason of depending from allowable presently amended independent claim 21.

Applicant asserts that claims 1, 2, 4, 6 through 15, and 21 through 25 are clearly allowable over the cited art.

Applicant request entry of this amendment for the following reasons:

The amendment is timely filed.

The amendment does not require any further search or consideration.

The amendment places the application in condition for allowance.

Respectfully submitted,

James R. Duzan

James R. Duzan
Registration No. 28,393
Attorney for Applicant
TRASKBRITT, PC
P.O. Box 2550
Salt Lake City, Utah 84110-2550
Telephone: 801-532-1922

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